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LAW OFFICE OF

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TELECOM/INTERNET LAW AND REGULATORY CONSULTING



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January 24, 2005

Via FedEx

Mr. Adam Lebrecht
Executive Consultant I
Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007-2927

Arizona Corporation Commission
DOCKETED

JAN 26 2005

DOCKETED BY	
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Re: CommPartners, LLC, Docket No. T-04251-A-04-0257, Second Set of Data Requests

Dear Mr. Lebrecht:

Attached is an original and thirteen (13) copies of CommPartners' response to the Commission's second set of data requests sent on November 24, 2004. Please contact me at 510 903-1304 with any questions.

Sincerely,

Kristopher E. Twomey
Counsel to CommPartners, LLC

cc: David Clark

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Data Request 1: Please indicate why you believe your proposed range of rates is just and reasonable using a competitive market analysis. Your analysis may contain publicly available examples of rates charged by the incumbent or other carriers for similar services or any other information that you believe demonstrates that your proposed rates are just and reasonable.

Please include any supporting materials.

Response 1:

CommPartners proposed rates are just and reasonable based on a comparison with rates charged by incumbent local exchange carriers and competitive local exchange carriers currently operating in Arizona.

For example with Residential Flat Rate Exchange Line Service, CommPartners proposes to charge as follows per Tariff No. 1, Sheet 25:

4.2.1.A	Monthly Charges	Per Month
	With CommPartners Long Distance	\$ 15.00
	Without CommPartners Long Distance	\$ 35.00

This is comparable to Qwest's residential flat rate service found in Qwest's Exchange and Network Services Price Cap Tariff, Section 5, Page 21:

2. Residence Flat Rate Service

	USOC	NONRECURRING CHARGE	MONTHLY RATE
• Individual line, each	1FR	\$27.50	\$13.18

For example with Business Flat Rate Exchange Line Service, CommPartners proposes to charge as follows per Tariff No. 1, Sheet 26:

4.2.1.A	Monthly Charges	Per Month
	With CommPartners Long Distance	\$ 20.00
	Without CommPartners Long Distance	\$ 35.00

This compares favorably with the maximum rates proposed by CommSouth in its Tariff No. 1, Page 20:

5.1 BASIC LOCAL SERVICE

5.1.1 Monthly Standard Service Fee

\$69.00

5.1.2 Application Processing Fee (one time charge)

\$60.00

This also compares favorably with Qwest's business rate as found in Qwest's Exchange and Network Services Price Cap Tariff, Section 5, Page 22:

3. Business Flat Rate Service

	USOC	NONRECURRING CHARGE	MONTHLY RATE
• Individual line, each	1FB	\$42.50 (R)	\$30.40 (R)

As for long distance, CommPartners rates are just and reasonable. CommPartners charges are as follows per Tariff No. 2, Page 48:

5.2.1 Switched One Plus Service

Usage Sensitive Charges (Rate Per Minute): \$0.10

Non-Usage Sensitive Charges: N/A

5.2.2 Dedicated One Plus Service

Usage Sensitive Charges (Rate Per Minute): \$0.07

Non-Usage Sensitive Charges: N/A

This compares favorably with Williams Communications, dba VYVX, LLC's rates of the following per its Tariff No. 1, Page 49:

5.2.1 Switched One Plus Service

Usage Sensitive Charges (Rate Per Minute): \$0.1414

Non-Usage Sensitive Charges: N/A

5.2.2 Dedicated One Plus Service

Usage Sensitive Charges (Rate Per Minute): \$0.0811

Non-Usage Sensitive Charges: N/A